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BY CM/ECF

March 3, 2021

The Honorable Katherine Polk Failla
United States District Judge
Southern District of New York

RE: *Azor-El, et al. v. City of New York, et al.*, 1:20-cv-03650-KPF (and related cases)
Reply re: Contact with Clients in Rikers Island

Dear Judge Failla:

This firm represents various Plaintiffs in this pending set of related and consolidated cases regarding conditions at Rikers Island. We write this letter to follow up on the issue of speaking with our clients who are incarcerated.

We had a meaningful and productive discussion with Defendants' counsel on our call today, we appreciate their efforts in trying to find a solution. While ordinarily we would not have filed a letter on this issue without trying to deal with the issue internally first, the fact that this is not the first time we have encountered challenges with communicating with our clients made us feel that it is necessary to note it on the record. We look forward to working with the City on a productive resolution.

We thank the Court for considering this matter.

Respectfully submitted,

KEENAN & BHATIA, LLC

By: */s/ Sonal Bhatia & E.E. Keenan*
Attorneys for Plaintiffs

Cc: Counsel of Record (by ECF)